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## MEMO ENDORSED, last page

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October 17, 2023

### By ECF

The Honorable Edgardo Ramos  
United States District Court  
for the Southern District of New York  
40 Foley Square  
New York, New York 10007

## MEMO ENDORSED

Re: *United States v. Brian Wong, 22 Cr. 395 (ER)*

Dear Judge Ramos:

We represent Brian Wong in the above-referenced matter and write to respectfully request that the Court permit Brian to attend his cousin's wedding in Nyack, New York on November 10, 2023, which is one day prior to the conclusion of his six-month period of home confinement on November 11. We have conferred with the Probation Office, which does not oppose this request. We have also conferred with the Government, which takes no position.

On April 12, 2023, the Court sentenced Brian to probation for a term of three years following his guilty plea to a one-count superseding information charging him with accessory after the fact to conspiracy to commit securities fraud and tender offer fraud. Docket No. 72. Brian's sentence included a six-month period of home confinement (*id.*), which, in light of the Probation Office's resource constraints, did not begin until May 11, 2023.

As we shared with the Court at sentencing, Brian maintains close relationships with many members of the extended Wong family, including his cousin who will be married on November 10. Brian's extended family members are instrumental components of his support system, and permitting Brian to attend the upcoming wedding comports with the objectives of supervision, especially as Brian begins to adjust to his new circumstances following the termination of his home confinement.

The Probation Office has informed us that Brian has fully complied with the terms of his probation to date, including by maintaining full-time employment. Brian has also paid in full all criminal monetary penalties imposed by the Court at sentencing—i.e., the assessment, fine, and forfeiture. In short, Brian has been a model supervisee.

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If the Court approves this request, Brian will drive from his New Jersey home on November 10, pick up his elderly parents in Manhattan, drive them to the wedding, attend the wedding as an overnight guest, and return to his home on November 11 after dropping off his parents in Manhattan.

We thank the Court for its consideration of this request.

Respectfully submitted,

*David Oliwenstein*

David Oliwenstein

cc: All Counsel of Record  
(By ECF)

Afonso Fernandes, Senior U.S. Probation Officer  
(By Email)

Defendant Brian Wong's application for permission to attend his cousin's wedding is granted.  
SO ORDERED.



Edgardo Ramos, U.S.D.J.  
Dated: 10/18/2023  
New York, New York